


## GOVERNMENT (REGIONAL) COMMENTS (GR)

### GR1

### GR1 Continued

SOUTHEAST LOS ANGELES COUNTY



**GATEWAY CITIES**  
COUNCIL OF GOVERNMENTS

June 28, 2012

**405 DEIR/EIS Comments**

On behalf of the Gateway Cities Council of Governments (GCCOG) Board of Directors (27 cities and Los Angeles County), we are submitting our comments on the DEIR/EIS for the proposed I-405 improvements that border our agency's southerly border at the largest community in the GCCOG, Long Beach. More detailed comments are included in the attachment. A summary of our comments are on the last two pages of the attachment. The GCCOG Board has reviewed this letter and has unanimously concurred with its comments and is submitting it to Caltrans District 12.

While supporting the idea of improving the I-405 south of the Los Angeles County border, as indicated in our comments, we believe the planning and execution of the DEIR/EIS is repeating the mistakes of the past between the two counties that resulted in the I-5 freeway being improved in Orange County while not being addressed in Los Angeles County. The cities that represent the GCCOG are the agencies behind addressing that deficiency for many years and are now partnered with the Los Angeles County Metropolitan Transportation Authority (MTA) and Caltrans District 7 to finally begin the improvements to I-5 in southeast Los Angeles County last year. The GCCOG supports continuing those improvements on I-5 into downtown Los Angeles.

The GCCOG is working with our partners, MTA and District 7, to address the transportation issues of southeast Los Angeles County. This has resulted in proceeding with either environmental documents or studies of all the freeways in southeast Los Angeles County and cooperation with other agencies for all other transportation projects located in or which travel through the GCCOG area. This includes, for example, regional bus coordination, coordination with the California High Speed Rail Authority, major commuter rail studies, arterial highway studies, etc. Additionally, we have reached out to OCTA and District 12 in the past, resulting in the preparation of the Orange and Los Angeles Inter-County Transportation Study completed in February 2008.

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Transportation issues at the county line were significantly discussed and developed in the preparation of that report at many workshops between staffs and elected officials that resulted in this valuable study. As pointed out in our comments, the results of that effort are not included or even addressed in the I-405 DEIR/EIS.

There are other examples of agency coordination from the GCCOG where, for example, we have included staff of OCTA in meetings on the preparation of the SR-91/I-605/I-405 Feasibility Study currently underway. OCTA staff has attended, at our request, many of our detailed meetings on the planning of I-405 improvements in Los Angeles County. We have made numerous requests to have meetings with senior OCTA staff since the beginning of this year, but nothing has been arranged. When the GCCOG completed an SR-91/I-605/I-405 Initial Corridor Studies Report in 2008, we provided that information to both OCTA and Caltrans District 12 for their use in planning improvements at the county line for I-405. As pointed out in our attached comments, none of these coordination efforts, materials or reports initiated or completed by the GCCOG were either used or even referenced in the I-405 DEIR/EIS. We are not even sure if the GCCOG was included in the NOP for the I-405 DEIR/EIS. We know the City of Long Beach was included but are not sure if their comments or suggestions at the time of the NOP were all addressed.

In addition to these referenced studies, we have also had prepared extensive traffic modeling that includes I-405 into Orange County and numerous traffic modeling runs that include various tolling options if Alternative 3 (toll option) extends into Los Angeles County. Some of the initial traffic model runs for tolling were provided to the OCTA staff months ago for coordination purposes. We will be glad to share these results with you, which are significant, as part of any inter-county transportation planning that the GCCOG is recommending. We believe that is the type of information that should have been included in the I-405 DEIR/EIS.

The GCCOG has outlined in the attached comments the major deficiencies of the I-405 DEIR/EIS and is going on record that it is incomplete as it did not include any regional coordination with the GCCOG, the City of Long Beach, MTA or District 7. For example, as indicated in our comments, the DEIR/EIS includes no analysis of impacts along I-405 or I-605 in Los Angeles County. Our own traffic modeling shows significant impacts for both the freeways as well as the arterial highways. Furthermore, the I-405 DEIR/EIS does not, for example, analyze the impacts to the arterial highway system in any sufficient detail at the north end of the project, within your project limits, or on any arterial highways in Long Beach. The GCCOG has studied more arterial highway intersections at the county line than the I-405 DEIR/EIS and has provided that information to the OCTA staff. Why is it not used? The OCTA staff has made numerous presentations on this project to GCCOG committees and has attended our SR-91/I-405/I-605 TAC meetings. Why is there no reciprocity?

In summary, the GCCOG is not pleased to be put in the position of having to respond in this fashion and wants to support the efforts of OCTA and Caltrans District 12 to

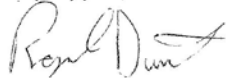
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improve I-405, but by not recognizing the good transportation planning that has occurred in the past, not doing any regional planning or coordination across the county line, and not responding to the GCCOG's request for coordination meetings, we have to state the I-405 DEIR/EIS is deficient and incomplete as it does not address the issues and concerns outlined in the attachment. This includes coordination of transit services at the county line that could reduce traffic on I-405 (see the Orange and Los Angeles Inter-County Transportation Study from 2008). Therefore, we are requesting that the I-405 DEIR/EIS be re-done and then re-circulated after the issues and concerns of the GCCOG (and likely similar concerns from the City of Long Beach, with whom we are coordinating) have been addressed and the necessary regional coordination has occurred. The results from that process should then be incorporated into a revised I-405 DEIR/EIS for circulation.

None of our agencies prosper by not cooperating and having to respond in this fashion. The Gateway Cities Council of Governments stands behind partnering and coordinating with other agencies.

Very truly yours,



Raymond Dunton, President  
Board of Directors  
Gateway Cities Council of Governments and  
Mayor Pro Tem City of Bellflower

Cc: Art Leahy, MTA  
Doug Failing, MTA  
Mike Miles, Caltrans, District 7  
Ron Kosinski, Caltrans, District 7  
Brent Green, Caltrans, District 12  
Will Kempton, OCTA  
Darrell Johnson, OCTA  
Pat West, City of Long Beach  
Dave Roseman, City of Long Beach  
MTA Board Member Diane DuBois  
Richard Powers, Gateway Cities COG  
Karen Heit, Gateway Cities COG  
Jerry Wood, Gateway Cities COG  
SR-91/I-605/I-405 Corridor Cities Committee and Technical Advisory  
Committee Members

## GR1 Continued

EIR/EIS COMMENTS  
BY GATEWAY CITIES COUNCIL OF GOVERNMENTS ON

SAN DIEGO FREEWAY

(I-405) IMPROVEMENT PROJECT

EA 0H1000/PN 1200000180

PREPARED BY THE STATE OF CALIFORNIA

DEPARTMENT OF TRANSPORTATION

JUNE, 2012

Background and Summary

SUMMARY

OCTA and Caltrans (District 12) have prepared a DEIR/EIS for the referenced project – I-405 improvements from the Los Angeles County line south to SR-73 (approximately 16 miles). As defined in the DEIR/EIS, the I-405 has current and future deficiencies that include mainline capacity, congestion, HOV capacity, GP lane operational and geometric deficiencies, existing interchanges within the study area that have geometric, storage and operational deficiencies and a general lack of capacity and technology infrastructure. Page S-2 of the Summary states that the project includes "1.4 miles north of I-605 (07-LA-405 PM 1.2)". This portion of the project is within Los Angeles County in the City of Long Beach. It further states on Page S-2 that "encroachments in Los Angeles County and work on SR-22 are associated with signing and striping to accommodate the transition from the existing to the proposed facility". Therefore, the northern terminus for this project is basically the Los Angeles County line along the I-405 and includes the I-405/I-605 interchange portion only within Orange County.

Section S.3 – Project Description

The DEIR/EIS on Page S-3 does recognize that "I-405 is generally a north-south route with 24 miles in Orange County and 48 miles in Los Angeles County. I-405 is part of the National Highway System and is considered a bypass route to Interstate 5 providing intra-regional and inter-regional access between Orange and Los Angeles Counties. I-405 also serves as a critical goods movement corridor connecting the San Diego and U.S./Mexico border region with the ports of Long Beach and Los Angeles".

Page S-1 states the purpose of the project. One of these purposes – as stated – is "to be consistent with regional plans".

**GR1 Continued**

Page S-3 states that "the north and south termini of the project, at the I-605 and SR-73 respectively, are locations where multiple freeways converge, generating congestion and causing delay. The termini have been logically chosen based on geography and transportation needs to ensure adequate response to transportation deficiencies at and around these points of intersection. The northern terminus of the proposed project is at the interchange of I-405 and I-605. The proposed additional lanes would enhance continuity along I-405 and terminate new lanes into available lanes on these other freeways".

Three build alternatives are proposed:

- **Alternative 1** – add a single GP lane in each direction on I-405 from Euclid Ave. to the I-605 interchange
- **Alternative 2** – add one GP lane in each direction from Euclid Street to the I-605 interchange (as in Alternative 1) plus a second GP lane in the northbound direction from Brookhurst St. to the SR-22/7<sup>th</sup> Street interchange and a second GP lane in the southbound direction from the Seal Beach Blvd. on-ramp to Brookhurst St.
- **Alternative 3** – add on GP lane in each direction on I-405 from Euclid St. to the I-605 interchange (as in Alternatives 1 and 2), plus add a tolled Express Lane in each direction of I-405 from SR-73 to SR-22 East. The tolled Express Lane and the existing HOV lanes would be managed jointly as a tolled Express Facility with two lanes in each direction from SR-73 to I-605.

A TSM/TDM Alternative was evaluated but not recommended a stand-alone project as it did not sufficiently address (according to the DEIR/EIS) the purpose of the project but its elements (or some of them) are included in the build alternatives. These are supposed to include "multi-modal alternatives to integrate multiple forms of transportation modes, such as pedestrian, bicycle, automobile, rail and transit".

**Section S.5 – Project Impacts**

Table S-1 on page S-13 states that neither of Alternatives 2 or 3 are "consistent with the RTP or the FTIP and that OCTA is currently pursuing revisions to both prior to the Final EIR/EIS, which will include the revised description and reference to the conforming documents".

Table S-1 on Page S-13 states under Community Impacts for the build alternatives that "implementation of the proposed project is anticipated to result in a beneficial effect on cohesion by reducing cut-through traffic within the adjacent neighborhoods". Table S-1 on Page S-19 summarizes that the build alternatives will increase traffic at the north end of the project by 13% to 25%. Table S-1 on Page S-32 states the build alternatives "increases of operational noise at all receptors are considered minor with

**GR1 Continued**

implementation of the recommended soundwalls summarized below. Project future noise conditions, when compared to the future no build noise conditions, generally increases or decrease slightly when compared to the future no build noise condition".

Table S-1, page S-35 states – for all three build alternatives – that "when considered with other cumulative projects as stated in Table 3.6-1, the alternative would contribute incrementally to cumulatively considerable impacts related for: Community Character, Short-term Temporary Construction Impacts and Visual Character and Quality".

**Section S.6 – Coordination with Public and Other Agencies**

Page S-38 lists the other public agencies and others that have been coordinated with. This list does not include the Gateway Cities Council of Governments, Los Angeles Metropolitan Transportation Agency (MTA) or LA Caltrans office (District 7).

**CHAPTER 1 – PROPOSED PROJECT**

**Section 1.1 - Introduction**

Figure 1-2 on page 1-3 shows the project limits extending about 1 mile into Los Angeles County and into the City of Long Beach.

**Section 1.2 – Project Purpose and Need**

Section 1.2.1 on page 1-5 includes as the purpose of the proposed project that the following objective be established: "to be consistent with regional plans and find a cost-effective early project solution for delivery".

Table 1-2 shows the existing and projected 2020 and 2040 LOS and V/C for the freeway – which shows it will be much worse and well into LOS F in the future for the existing conditions. The calculations do not show the LOS or V/C on the project limits within Los Angeles County. Table 1-7 on page 1-11 shows population and growth trends but does not include the annual growth rate for the portion of the project on I-405 in Los Angeles County or Long Beach (or even refer to it). On page 1-12 no mention of nearby and the very relevant developments of Long Beach State and the Long Beach airport (as a minimum) are not mentioned that would impact the project.

Page 1.14 discusses operational deficiencies for the project. This includes the statement that: "Operational problems occur on I-405 primarily because of physical bottlenecks". The descriptions of these "bottlenecks" do not include, for example, any of the projects within the limits in Los Angeles County or the SB 605 to SB 405 connector ramp which significantly backs up the SB 605 in the PM peak hours into Los Angeles County.

## GR1 Continued

Page 1-16 includes a description of regional transportation plans that the I-405 DEIR/EIS coordinates with. This list does not include the following:

- Orange County/Los Angeles County Inter-County Transportation Study and Results
- SR-91/I-605 Needs Assessment
- SR-91/I-605/I-405 Initial Corridor Studies
- SR-91/I-605/I-405 Feasibility Study
- Proposed Los Angeles County Express lane studies (by SCAG and MTA)
- I-710 Corridor Project
- I-605 Congestion Hot Spots

The purpose of this coordination – as stated on page 1-16 – is to “maximize mobility and accessibility for people and goods in the region, preserve and ensure a sustainable regional transportation system and to protect the environment and health of our residents by improving air quality and encouraging active transportation, and maximize the productivity of our transportation system”.

Page 1-19 states the “I-405 represents a major link to other freeway systems..... and serves as a major link between Orange and Los Angeles Counties and is part of the National Highway System and is considered a bypass route to I-5. Page 1-20 discusses regional access but does not include the portion of Long Beach within the project limits. This is somewhat surprising as it is stated on this page that “the northern segment, between Valley View Street and I-605, is considered one of the heaviest sections of freeway in the nation”.

Page 1-22 discusses the independent utility for the project. It states “to be considered for independent utility, a project must not preclude other potential transportation projects from being implemented in the future”. It goes on to state that “the proposed I-405 project satisfies FHWA’s regulations for “independent utility” because it would not prevent the implementation of future transportation projects, and, independent of other actions, it would also provide considerable transportation benefits to the project stated and purpose and need”. This statement is made without any consideration of projects in Los Angeles County that are currently being planned and coordinated with staff of OCTA. Page 1-23 states that “the north termini have been logically chosen based on geography and transportation needs to ensure adequate response to transportation deficiencies at and around these points of intersection”. It goes on to state that “the proposed additional lanes on I-405 south of I-605 would terminate into and provide enhanced traffic service between I-405 and the SR-22 and I-605 freeways and that the proposed additional lanes would enhance lane continuity along I-405 and terminate new lanes into available lanes on these other freeways”. It may seem counter-intuitive but this last quote is inconsistent in that how are enhancements achieved when terminating

## GR1 Continued

(ending) the project into available lanes with the project limits and providing no documentation to substantiate the statement. Page 1-24 states that “the proposed alternatives would not restrict any other foreseeable transportation improvements in the corridor and none of the proposed alternatives would affect the HOV lanes outside the project limits”. No quantifiable evidence that supports this last statement is provided in the DEIR/EIS.

## CHAPTER 2 – PROJECT ALTERNATIVES

## Section 2.2 – Project Alternatives

Figures 2-1 and 2-2 on pages 2-6 and 2-7 show the proposed lane configurations. However, neither of the figures show the lane configurations within the project limits into Los Angeles County or how the lane transitions would occur.

Page 2-14, as an example, on page 2-14, states why Alternative 3 is a viable alternative as it meets the projects purpose. However, the one of the stated objectives is “be consistent with regional plans”. No discussion of this objective is included in this section or addressed in any detail in the DEIR/EIS.

## Section 2.2.3 – Transportation System Management/Transportation Demand Management Alternative

Page 2-23 discusses in very general terms the TSM/TDM features but provides little to no detail. The Orange County/Los Angeles County Inter-County Transportation Study studied TSM/TDM between the two counties in detail but none of the “projects” or “ideas” that were developed between the two counties are included in the DEIR/EIS. The implementation of these TSM/TDM alternatives will reduce the demand on the I-405 but this was not addressed or quantified in the DEIR/EIS.

## CHAPTER 3 – AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES, AND AVOIDANCE, MINIMIZATION AND/OR MITIGATION MEASURES

## Chapter 3.1 – Human Environment

## Section 3.1.6 – Traffic and Transportation/Pedestrian and Bicycle Facilities

Page 3.1.6-4 lists the local interchanges within the project limits that were studied. This does not include any interchanges of the segment of the project included in Los Angeles County but does include the I-405/I-605/SR-22 system interchanges. Figure 3.1.6-1 on page 3.1.6-5 highlights the interchanges that were studied but clearly does not include the interchanges within the project limit (as a minimum) on I-405 in Los Angeles County. Table 3.1.6-1 lists the intersections analyzed for the project. This list includes no intersections in Long Beach or Los Angeles County or a very significant number of

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intersections away from the freeway that should also have been included for such a large project.

Table 3.1.6-2 shows that the mainline I-405 ADT is expected to increase by as much 150,000 vehicles per day by 2040 but does not include an analysis of the impacts of this increasing traffic within the project limits in Los Angeles County or beyond (on the freeways or the intersections beyond the project limits) (Also discussed on pages 3.1.6-94 and 3.1.6-95 of the DEIR/EIS). Table 3.1.6-4 and Table 3.1.6-5 show how the GP lanes and the HOV/Express lanes will operate in the future for 2020. Table 3.1.6-12 and Table 3.1.6-13 show how the GP lanes and the HOV/Express lanes will operate in the future for 2040. In both cases the GP lanes LOS is F and the HOV/Express lanes are operating at LOS D. This indicates that the GP lanes LOS is degraded to make the HOV/Express lanes operate better (pushing traffic from the HOV/Express lanes into the GP lanes). This indicates that the GP lanes where the northern termini ends and has independent utility (as stated in the DEIR/EIS) will negatively impact the GP lanes and connector ramps at the northern termini where the project suddenly ends. The DEIR/EIS does not address how the GP lanes at the north end of the I-405 within the project limits will operate or even beyond.

Table 3.1.6-10 lists the interchanges and segments that were studied but does not include any interchanges on I-405 north into Los Angeles County within the project limits or beyond.

Figure 3.1.6-12 on page 3.1.6-71 shows AM/PM peak hour volumes but does not include any queuing or weaving analyses at the north end of the project. Also, the DEIR/EIS does not include an analysis of how the project might impact accident rates and safety issues at its northern termini.

Page 3.1.6-96 states that "the 2012 RTP includes a regional Express Lane Network that would build upon the success of the 91 Express Lanes in Orange County and two demonstration projects in Los Angeles County". It also states that "I-405 within the project limits is part of that network". It further states that "incorporation of the existing HOV lanes on I-405 into the Express Lanes proposed in Alternative 3 is consistent with the 2012 RTP and the more set of strategies emerging from management of existing HOV lanes". The DEIR/EIS at least acknowledges this coordination within Los Angeles County but provides no evidence of how this coordination is consistent with the 2012 RTP and how that "coordination" would impact the freeway and arterial highway system in the adjacent Los Angeles County. Therefore, this statement is mis-leading.

Table 3.1.6-17 shows the transition area LOS locations but does not include the transition from the I-405 into Los Angeles County within the project limits. Page 3.1.6-102 discusses the impacts on the connectors at the north termini and indicates that "the

**GR1 Continued**

effect of Alternative 3 would be to improve flow on the GP branch connector and provide the potential for some modest congestion on the Express Lane direct connector". Gateway Cities own studies show that this statement is not correct and Alternative 3 will make the situation worse – not better – as stated above.

**Chapter 3.4 – Relationship between Local Short-Term Uses of the Human Environment and the Maintenance of Long-Term Productivity**

**Section 3.4.1 – Build Alternatives**

Page 3.4-1 states that "long-term benefits would include improvement to the transportation network in the area, reduction of congestion and improved intersection circulation". The DEIR/EIS does not include any analysis at the north end of the termini of the project on the I-405 to support this statement within the project limits on the I-405 or beyond on either the I-405 or I-605. The DEIR/EIS actually shows degradation in GP mainline operation for Alternative 3, in particular, showing that the quoted statement is incorrect at the north termini. This is supported by Gateway Cities own analyses.

**CHAPTER 3.6 – CUMULATIVE IMPACTS**

**Section 3.6.2 – Methodology**

Page 3.6-1 states that "cumulative impacts were identified by comparing the impacts of the proposed project and other past, current, or proposed actions in the area to establish whether, in the aggregate, they could result in cumulative environmental impacts". As stated previously, none of the studies and work underway that OCTA has been provided is referenced or used in the DEIR/EIS. Therefore, there are cumulative impacts from both the proposed build alternatives with both no-build and build alternatives being considered by MTA and Gateway Cities making the objective as quoted above not able to be achieved by the DEIR/EIS. For example, on page 3.6-2 it discusses further actions anticipated to occur include further growth within a bunch of cities but does include Long Beach. The same applies to similar statements made on page 3.6-3. Also, Table 3.6-1 lists reasonably foreseeable projects on page 3.6-4 but does include any of the projects being planned in Los Angeles County or previous coordination of projects between Orange and Los Angeles Counties and is incorrect and incomplete.

**Section 3.6.5.5 – Community Impacts**

Page 3.6-8 discussed community impacts for the proposed projects but does not include any community impacts in Long Beach within the project limits or beyond on either I-405 or I-605.

## GR1 Continued

SUMMARY OF GATEWAY CITIES COUNCIL OF GOVERNMENTS COMMENTS

The following summarizes the comments by the Gateway Cities Council of Governments (GCCOG). The GCCOG generally supports the proposed build alternatives but has major concerns with the lack of coordination at the county line. These are reflected in the comments offered below:

1. Lack of Past Regional Coordination – OCTA has in the past been provided copies of the SR-91/I-605 Needs Assessment and the SR-91/I-605/I-405 Initial Corridor Studies prepared by the GCCOG a few years ago. Meetings were held with OCTA to discuss coordination of designs developed at the time at the I-605/I-405 interchange. None of this coordination or use of the information provided by the GCCOG was provided and needs to be included in the DEIR/EIS. 25
2. Lack of Current Regional Coordination – The GCCOG and MTA have been proceeding with a Feasibility Study to improve the SR-91/I-605/I-405 freeways adjacent to Orange County. This study has been proceeding since the middle of 2011. OCTA staff has been attending workshops and meetings with the TAC and the CCC overseeing that project. None of this coordination or effort has been included in the DEIR/EIS. This includes the traffic modeling at the county line if Alternative 3 is built and the "impact" on the negative GP lanes on the I-405 and I-605 of this build alternative. The extent of the impacts for improving I-405 beyond the project limits is not analyzed or quantified in the DEIR/EIS. These impacts will extend well beyond the project limits and, while some minor references to other regional planning is referenced, no qualitative or quantitative analyses are provided in the DEIR/EIS, making it incomplete. 26
3. Lack of Freeway Coordination – As part of the Feasibility Study, detailed geometric plans have been prepared for both the I-605 and I-405 leading up to the county line and into the I-605/I-405 interchange and provided to OCTA staff. Those impacts across the county line are known and coordination with that study was not presented in the DEIR/EIS or coordinated with the I-405 DEIR/EIS despite repeated requests. 27
4. Long Beach Coordination – The project limits for the DEIR/EIS extend a little over a mile into Long Beach. However, no interchanges north of the County line on I-405 were analyzed or considered in the DEIR/EIS in Long Beach as well as any intersections in Long Beach. In fact the SR-91/I-405/I-605 Feasibility Study includes more intersections analyzed around the I-405/I-605 interchange than considered or analyzed in the DEIR/EIS. This information has been provided to the OCTA staff. Without Long Beach impacts analyzed in the DEIR/EIS, the DEIR/EIS cumulative impacts and other impacts are incomplete. Also, more 28

## GR1 Continued

extensive arterial highways and intersections need to be included in the DEIR/EIS. 28

5. TSM/TDM Coordination of Projects – The DEIR/EIS does not use the results of the Inter-County Transportation Study or make use of much in the way of the potential for transit projects to reduce the demand on the I-405. Such coordination with Long Beach State and the Long Beach Airport are examples of how TSM or TDM projects would have some impact if properly analyzed. 29
6. Traffic Impacts – The potential for the freeway volumes to increase by 150,000 vehicles per day is disclosed in the DEIR/EIS but no impacts of how this traffic will get across the county line is discussed in any detail. One of the stated objectives for the DEIR/EIS is "to be consistent with regional plans". The DEIR/EIS by not coordinating with the variety of previous and current regional planning (or even acknowledging it) in the DEIR/EIS make the DEIR/EIS incomplete with respect to this objective. 30
7. Independent Utility – The GCCOG does not believe that the independent utility assessment as stated in the DEIR/EIS is met as the coordination with regional plans that have taken, are taking or will take place has not taken place and is not discussed in any detail in the DEIR/EIS and some very relevant regional projects are not included at all, making the DEIR/EIS incomplete. 31

**GR2**



**ORANGE COUNTY FIRE AUTHORITY**  
P.O. Box 57115, Irvine, CA 92619-7115 • 1 Fire Authority Road, Irvine, CA 92602  
Keith Richter, Fire Chief (714) 573-6000 www.ocfa.org

July 5, 2012

Caltrans – District 12  
c/o Smita Deshpande  
2201 Dupont Drive, Suite 200  
Irvine, CA 92612

Subject: I-405 Freeway Expansion

To Ms. Deshpande:

The Orange County Fire Authority (OCFA) provides fire protection and all-risk emergency response services for the City of Seal Beach. The OCFA has concerns regarding the impact of the expansion of the 405 freeway project; specifically the proposed reduction in the width of Almond Avenue in the City.

Almond Avenue is a collector road for the College Park East neighborhood. The area has predominately cul-de-sac streets with the sole access route being Almond Avenue. The project's current plan appears to impact access to this area by relocating the existing sound wall as much as ten (10) feet to the north and thereby narrowing this street.

Reduction of the width of the street can have an impact on OCFA's ability to respond to and operate at an emergency. Many of the fire engines and equipment that are used to provide service require larger than normal turning radius and full size streets. Typically our standards for this access are adopted into City ordinances to insure rapid response to emergencies.

OCFA is concerned by the proposed narrowing of this street which may hamper emergency response times and would encourage alternative options be considered and offered to the City.

Your consideration is appreciated.

Sincerely,

Rob Patterson  
Division Chief  
Orange County Fire Authority  
8081 Western Avenue  
Buena Park, California 90620  
(714) 527-2790

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RESIDENTIAL SPRINKLERS AND SMOKE ALARMS SAVE LIVES

**GR3**



**ORANGE COUNTY SANITATION DISTRICT**

We protect public health and the environment by providing effective wastewater collection, treatment, and recycling.

July 26, 2012

Smita Deshpande, Branch Chief  
Attn: 405 DEIR-DEIS Comment Period  
Caltrans-District 12  
2201 Dupont Drive, Suite 200  
Irvine, CA, 92612



SUBJECT: Draft Environmental Impact Report / Environmental Impact Study  
for the San Diego Freeway (I-405) Improvement Project

This letter is in response to the above referenced Draft Environmental Impact Report/Study for a project within Orange and Los Angeles counties. The project site extends along the I-405 freeway between the SR-73 and I-605.

The Orange County Sanitation District (OCSD) is concerned with a few items:

- 1) Re-designation of the any of OCSD parcels or properties could limit OCSD's ability to provide sewerage services and will require an update of the Specific Plan for the Treatment Plant No. 1 site. The plan for OCSD property should be clearly described so OCSD can respond to potential impacts. 1
- 2) Potential impacts to the entrance to OCSD are not described in the document. OCSD needs 24-hour access to the entrance for plant operations. If there are planned closures of the entrance, the document should identify durations and detour routes. Also, there should be analysis of estimated impacts to those local streets that OCSD traffic will be diverted to including how emergency services will serve the site. 2
- 3) The front entrance is also the only access point for the hydrogen fuel-cell station. As one of the two stations in the area, accessibility is very important. Forecasting projections indicate an increased use of fuel-cell vehicles which will result in increased traffic volume. 3
- 4) There are several sewer lines that will need to be protected in place or relocated as a result of the freeway expansion, OCSD will need to review the plans for that portion of the work. 4
- 5) Dewatering to any sewer requires a Special Purpose Discharge Permit. 5

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County of Orange

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OCSD staff will need to review/approve the water quality of any discharges and the measures necessary to eliminate materials like sands, silts, and other regulated compounds prior to discharge to the sanitary sewer system. } 6

Thank you for the opportunity to comment on the proposed development. For planning issues regarding this project, please contact Jim Burror at (714) 593-7335.

*Daisy Covarrubias*

Daisy Covarrubias, MPA  
Senior Staff Analyst

DC:sa  
EDMS:003059837/1.12a

## GR4



**South Coast  
Air Quality Management District**  
21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

E-mailed: July 17, 2012  
405.dedcomments.parsons@parsons.com

July 17, 2012

Ms. Smita Deshpande  
Caltrans-District 12, "Attn: 405 DEIR-DEIS Comment Period"  
2201 Dupont Drive, Suite 200  
Irvine, CA 92612

**Review of the Draft Environmental Impact Report (EIR) for the  
Interstate 405 (I-405) Project**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above mentioned document. The AQMD staff is concerned about potential air quality impacts of this proposed project and that the Draft EIR provides an air quality analysis that is not adequate to determine these potential impacts pursuant to AQMD Guidance and CEQA Guidelines. As a result, the air quality impacts may be understated in the Draft EIR and potentially significant impacts may not have been disclosed to the public. The lead agency generally concludes that the project will have a net environmental benefit by reducing regional air quality impacts by improving traffic flow and reducing congestion in the project area. AQMD staff recognizes and supports the benefits of decreased traffic congestion that can reduce exhaust emissions from cars and trucks. However, the proposed project could increase health risk impacts to residents in close proximity to the Interstate 405 (I-405) Freeway. The project will add at least one general purpose lane to the I-405 Freeway (within the project area) and could provide one additional general purpose or toll express lane in each direction. As a result, the additional freeway lanes placed closer to residences could potentially increase localized impacts. Further, the addition of lanes will increase freeway capacity and could have potential growth inducing impacts. } 1

There are several areas in which the Draft EIR has not adequately addressed the potential for air quality impacts. These include the determination of the project's health risk impacts to surrounding sensitive receptors, local and regional air quality impacts, climate change impacts, the use of an inappropriate CEQA baseline for existing conditions, growth inducing impacts, the lack of quantification of mitigation measure effectiveness, and the lack of consideration of additional alternatives/mitigation that would reduce overall VMT. Further, the lead agency has not provided sufficient information to demonstrate that the project is a transportation control measure (TCM) as stated in the Draft EIR. Because of the technical inadequacies of the draft EIR the AQMD staff strongly recommends that the lead agency revise the air quality analysis based on the comments contained within this letter. } 2

GR4 Continued

Ms. Smita Deshpande

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July 17, 2012

Pursuant to Public Resources Code Section 21092.5, we request that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the final EIR. Additional detailed comments on this project are attached to this letter. Should you have any questions, please contact Dan Garcia at (909) 396-3304.

Sincerely,

*Ian V. MacMillan*

Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

IM:DG

ORC120523-02  
Control Number

3

GR4 Continued

Ms. Smita Deshpande

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Transportation Control Measure

- Page 1-21 of the Draft EIR states that the proposed project qualifies as a Transportation Control Measure (TCM), but does not provide any information in the Draft EIR to support this determination. AQMD notes that our 2007 Air Quality Management Plan (AQMP) does not identify the proposed project as a TCM. While certain elements of the project alternatives in the Draft EIR may be applicable to TCM ORA00193, this measure alone does not qualify the project as a TCM. As shown in Table 1 below TCM ORA00193 is specific to the design of "HOV to HOV lane connectors," but this TCM captures only a small portion of the proposed project. Further, based on the operational emissions analysis the project will result in an increase of SOx, PM10 and PM2.5. Therefore, the AQMD staff strongly recommends that the lead agency provide clarification of the project's qualifications as a TCM.

Table 1: ORA000193 Listed in the 2007 AQMP

Final 2007 AQMP  
June 2007

2007 AQMP TCM Projects  
(from 2006 RTIP)

Appendix IV-C

HOV Improvements, HOV Bypasses, Connectors, and New Interchange with Ramp Meters			
Lead Agency	Project ID	Description	2006 RTIP Completion Date
CALTRANS	12576	RTE. 576/69 HOV CONNECTOR INDUSTRY FROM OLD BREA CANYON ROAD TO GRAND AVENUE - HOV DIRECT CONNECTORS AND COLLECTOR ROAD (BOTH DIRECTIONS) (CAM 12576, PPNOM 04990)	2007
CALTRANS	LA996134	RTE. 514 INTERCHANGE & HOV LNS ON RTE 14 - CONSTRUCT 2 ELEVATED LANES - HOV CONNECTOR (DIRECT CONNECTORS) (CAM 16400) (2001 CFP 0343) (PPNO 0169M)	2010
ORANGE COUNTY TRANS AUTHORITY (OCTA)	ORAD00193	SR 22/405 AND I-405/405 INTERCHANGES. DESIGN HOV TO HOV LANE CONNECTORS	2015
ORANGE, CITY OF	ORA990443	SR 22 AND CITY DRIVE INTERCHANGE IMPROVEMENTS. RECONFIGURE FREEWAY INTERCHANGE AT SR 22 FROM SR 67 TO LEWIS STREET - FROM 66 TO 62 LANES (ADDING 2 HOV LANES)	2007
RIVERSIDE COUNTY TRANS COMMISSION (RCTC)	RFW010212	ON SR91 - ADAMS TO 60215 IC. ADD HOV LNS, AUX LNS (MADISON-CENTRAL), BRIDGE WIDENING & REPLACEMENTS, EB/RB SHADED RAMPS, IC MOUNTS-CONSTRUCT 1 + SOUND/RETAINING WALLS	2013

Local Operational Air Quality Impacts

- The lead agency did not conduct a localized air quality analysis or Health Risk Assessment (HRA) to determine how the construction or operation of the project may impact the residences, contrary to CARB, CAPCOA, and AQMD Guidance for projects that place sensitive receptors within close proximity of a freeway. According to the air quality analysis, over 1.5 million additional vehicles miles traveled per day will occur on this segment of the I-405 Freeway. Because of the project's widening of the freeway, the emissions source will be located closer to adjacent residents. The lead agency did not analyze the potential impacts to all local ambient air quality standards from this activity, nor did it evaluate potential health risks. Localized high pollutant concentrations found in close proximity (e.g., 500 feet) of a freeway have been associated with a myriad of potential adverse health effects, including potential increases in cancer risk, increased rates of asthma, decreased lung function, and other adverse health outcomes (see Chapter 9 of the Draft 2012 AQMP for further details).

The lead agency relied on guidance from the Federal Highway Administration to quantify overall mobile source toxics emissions and determined that the project would result in a

## GR4 Continued

Ms. Smita Deshpande

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overall decrease of MSATs, therefore, the project would have insignificant impact on sensitive receptors. Pollutant concentrations are a result of total emissions in addition to site-specific characteristics such as proximity to the source, meteorology, and topography. The Draft EIR is therefore insufficient for determining potential health risk impacts to sensitive receptors from the project and it ignores section 15064 of the CEQA Guidelines that requires *substantial evidence* to determine the significance of an impact. Furthermore, Caltrans has relied on an HRA for other CEQA documents including the Schuyler Heim Bridge project and the I-710 corridor expansion project. Therefore, AQMD staff recommends that the lead agency revise the air quality analysis to include a HRA for the proposed project. Further, the lead agency is strongly encouraged to, at a minimum, identify the total number of residences within 500 ft of the project's boundary (as measured from the outermost travel lane) in the existing condition and for each alternative. Even though some project alternative may have lower MSAT emissions, there may be a greater number of people exposed to these emissions.

Construction Emissions Analysis

3. The peak daily construction emissions presented in Table 3.2.6-8 of the Draft EIR demonstrates significant NOx emissions impacts from the project in comparison to AQMD regional thresholds; however, the lead agency determined that the proposed project will have insignificant impacts from construction related activities. Specifically, the lead agency concluded that the project's construction emissions would be less than significant as a result of the temporary (four and a half years) nature of the project's construction activity combined with the implementation of air quality measures AQ-1 through AQ-14. However, the lead agency did not quantify the effectiveness of the air quality measures or substantiate why its classification of temporary construction emissions are not subject to regional emissions significance thresholds. Therefore, AQMD staff recommends that the lead agency provide a revised air quality analysis that quantifies the effectiveness of the project's air quality measures (AQ-1 through AQ-14) and uses the AQMD's construction emissions thresholds to make a significance determination.<sup>1</sup>

Further, given that construction activity for the project may result in a temporary increase of traffic congestion (as stated on page 3.2.6-28 of the Draft EIR) the AQMD staff recommends that the lead agency's revised analysis account for any emissions increase resulting from this congestion in the construction emissions analysis. Also, the lead agency's revised emissions analysis should reflect the most current version of RoadMod 7.1.1.

Climate Change Impacts

4. On page 4-57 of the Draft EIR, the lead agency states, "... it is CalTrans determination, that in the absence of regulatory or scientific information related to greenhouse gas emissions and CEQA significance, it is too speculative to make a determination of the project's direct impact and its contribution on the cumulative scale to climate change," AQMD staff refers the lead agency to Section 15064.4(b)(2) of the CEQA Guidelines, that state, "whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project." AQMD staff therefore requests that the lead agency revise the project's

<sup>1</sup> <http://www.aqmd.gov/ceqa/hdbk.html>

## GR4 Continued

Ms. Smita Deshpande

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greenhouse gas emissions analysis to include a determination of significance, and, if necessary, feasible mitigation measures.

CEQA Baseline

5. The lead agency used an incorrect CEQA baseline throughout the analysis to determine the significance of impacts. Pursuant to Section 15125 of the CEQA Guidelines, the existing environmental setting "at the time that environmental assessment commences ... will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." Instead of using this required methodology, the lead agency chose to compare a hypothetical and speculative future scenario without the project to one with the project to determine CEQA and NEPA impacts. This speculative approach is contrary to CEQA requirements and serves to underestimate potential impacts.

Growth Inducing Impacts

6. Page 2.2-3 of the Draft EIR Traffic Study states "For the I-405 Improvement Project a single demand forecast was prepared. Forecasts for each of the alternatives utilize the same total traffic volumes on a segment but redistribute volumes among the different lane types, as necessary." However in Appendix A2 of the Traffic Study, each alternative is shown to have different total traffic volumes and VMT. The No-Build Alternative has the lowest volume, with progressively higher volumes for each alternative up to a maximum for Alternative 3. The lead agency should clarify how the future traffic volumes were determined and reconcile the above quoted text with the volumes presented in Appendix A2 and elsewhere in the CEQA document. For example, the current reported volumes indicate that alternatives with more widening have higher volumes. It would therefore appear that the project is inducing growth as the widened freeway would be a trip attractor. It is also not clear if the additional capacity allowed by Alternatives 2 and 3 are accounted for in the recently approved RTP/SCS. This additional capacity may have the possibility of inducing growth in the area that have additional impacts beyond those discussed in the Draft EIR. Any growth inducing impacts from potential project alternatives should be analyzed pursuant to CEQA Guidelines §15126 (d) prior to approving the Final EIR.

MSAT Analysis

7. The air quality analysis in the Draft EIR uses the CT-EMFAC tool to estimate potential toxic emissions from the proposed project alternatives. The worksheets from the year 2040 analysis are contained in the appendices to the Air Quality Technical Study. These worksheets use the following assumptions in Table 2 below to determine potential toxic emissions.

Table 2 MSAT Analysis Assumptions

Alternative	VMT (peak hours)	VMT (off peak hours)	Total VMT	Peak Hour speed	Off Peak Hour Speed
No Build	1,357,853	1,555,211	2,913,064	5	65
Alternative 1	1,357,853	1,555,211	2,913,064	15	65
Alternative 2	1,357,853	1,555,211	2,913,064	40	65
Alternative 3	1,357,853	1,555,211	2,913,064	50	65

GR4 Continued

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It is unclear how the VMT assumptions in Table 2 above correspond to the VMT reported in Appendix A2 of the Draft EIR Traffic Study. In this appendix, the VMT ranges from a low of 4,618,000 for the No Build alternative to 5,631,000 for Alternative 3. The existing condition VMT from this appendix is listed as 4,063,000. The discrepancy between the VMT reported in the traffic study and the VMT used in the MSAT analysis should be revised in the Final EIR.

The assumptions regarding traffic speed for each alternative are simplified, and may not accurately reflect potential impacts from this project. For example, it is unclear if the Peak Hour Speeds listed in Table 2 above are consistent with the expected speeds from the traffic study for each section of the freeway. Because toxic emissions can have a highly localized impact, the calculation of toxic emissions budgets should be undertaken on a much finer scale and consistent with project links identified and analyzed in the traffic study. Speeds should be evaluated for each section and made consistent with the predicted traffic flow of that section.

Bottleneck at North End of Project

8. The proposed project includes a bottleneck at the north end of the project site at the junction with the I-605 freeway. For example, the freeway may go from up to 10 lanes in the project area down to 5 lanes in the adjacent existing freeway section in a very short distance. While the No Build Alternative includes a volume increase of only 15% at this section, Alternative 3 may increase volume by 38%, or 142,000 extra vehicles per day (Appendix A2, Draft EIR Traffic Study). The project area may have the capacity to handle this traffic volume, but it is not clear that the adjacent freeway section will be able to accommodate the same volume. With the increase in traffic volume that is induced and/or accommodated by this project, the lead agency should present an analysis of the potential regional and localized air quality impacts from the proposed bottlenecking at this location.

Increase in VMT

9. The proposed project may add up to 1.5 million miles of new vehicular travel along the project length. However there is little discussion of potential project alternatives that may instead reduce vehicular travel, and the potential emissions from these vehicles. This could include additional Bus Rapid Transit (BRT) lines, fixed guideway transit, and zero/near-zero emission technology alternatives. These alternatives are either not discussed or quickly dismissed in the alternatives analysis without the adequate discussion of their potential utility in serving the transportation needs of this region. The South Coast Air Basin needs to reduce NOx emissions by approximately two thirds above and beyond adopted regulations by 2023 in order to meet Ambient Air Quality Standards required by the Clean Air Act (see the Draft 2012 AQMP for further discussion of regional air quality issues). Because the majority of NOx emissions come from mobile sources, significant effort needs to be made for all transportation projects to ensure that they reduce emissions to the maximum extent feasible.

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GR4 Continued

Ms. Smita Deshpande

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Conformity Analysis

10. Alternatives two (2) and three (3) of the proposed project are not currently programmed in the Regional Transportation Plan and if selected as the lead agency's preferred alternative would require a revised conformity analysis. Therefore, the AQMD staff requests that in the event that Alternative 2 or Alternative 3 are selected the lead agency clarify whether the project will demonstrate conformity consistent with EPA's updated quantitative Hot-Spot Analyses Guidance Document [Federal Register, FRL-9241-3]. The lead agency should disclose to the public any new information relative to the projects conformity analysis

Operational Emissions Analysis

11. AQMD staff requests that the lead agency update two aspects of its estimation of potential criteria pollutant emissions during operation of the project. First, the estimate of VMT on segments of the project does not appear to match estimates from the Draft EIR traffic study. For example, in Appendix D of the Air Quality Technical Study in the Draft EIR, the SR-73 to Brookhurst section includes a total of 1,029,979 miles of daily vehicle travel. However Appendix A2 of the Traffic Study Appendix in the Draft EIR shows a total of 1,053,000 daily VMT for this section. The total VMT for all sections of the project should be reviewed and updated as necessary to ensure the traffic study matches the air quality study. Second, the analysis uses EMFAC 2007 to estimate emissions for future years. The state Air Resources Board has released the updated EMFAC 2011 that updates vehicle emission factors. The Final EIR should present an estimate of operational emissions using these updated emissions factors.

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## GR5



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Cheryl Viegas-Walker, El Centro  
  
Transportation  
Kolth Millhouse, Ventura County  
Transportation Commission

July 16, 2012

Ms. Smita Deshpande  
Branch Chief, Caltrans-District 12  
Attn: 405 DEIR-DEIS Comment Period  
2201 Dupont Drive, Suite 200  
Irvine, CA 92612

RE: San Diego Freeway Interstate 405 (I-405) Improvement Project

Dear Ms. Deshpande:

On behalf of the Southern California Association of Governments (SCAG), the designated Metropolitan Planning Organization for the six county region consisting of Ventura, Los Angeles, Orange, San Bernardino, Riverside, and Imperial Counties, I am writing regarding the Orange County Transportation Authority's (OCTA) San Diego Freeway I-405 Improvement Project, currently undergoing public comment following release of the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS).

The I-405 Improvement Project proposes to widen the I-405 corridor in Orange County for approximately 16 miles between 0.2-mile south of Bristol Street and 1.4 miles north of I-605, as well as portions of State Route 22 (SR-22), State Route 73 (SR-73), and Interstate 605 (I-605). The proposal would either (Alternative 1) add one general purpose (GP) lane in each direction between Euclid Street I-605; or (Alternative 2) add two GP lanes in each direction between Brookhurst/Euclid Streets and I-605; or (Alternative 3) add one GP lane between Euclid Street and I-605 and one tolled Express Lane in each direction between SR-73 and SR-22 East, with the tolled Express Lanes and existing HOV lanes to be managed jointly as a tolled Express Facility with two lanes in each direction between SR-73 and I-605.

The project seeks to reduce congestion, increase mobility, improve trip reliability, maximize throughput, and optimize operations while minimizing environmental impacts and right-of-way (ROW) acquisition to one of the nation's busiest corridors.

Alternative 3 of this project is included in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) with project ID ORA030605. The project is included within the financially constrained portion of the RTP/SCS.

To ensure regional connectivity, SCAG encourages continued cooperation and collaboration with the Los Angeles County Metropolitan Transportation Authority, Caltrans District 7, and the affected subregions, to address regional mobility beyond county lines and we would be pleased to participate in such efforts as appropriate.

Sincerely,

Hasan Ikhrata  
Executive Director

CC: Will Kempton

The Regional Council is comprised of 84 elected officials representing 191 cities, six counties, six County Transportation Commissions and a Tribal Government representative within Southern California.

2012.05.07

## GR6

San Joaquin Hills  
Corridor Agency

Chairman:  
Scott Schoeffel  
Dana Point



Foothill/Eastern  
Corridor Agency  
Chairman:  
Bill Campbell  
County of Orange  
3rd District

June 14, 2012

Ms. Smita Deshpande  
Caltrans – District 12  
“Attn: 405 DEIR-DEIS Comment Period”  
2201 Dupont Drive, Suite 200  
Irvine, CA 92612

RE: Comments on the Draft Environmental Impact Report/Environmental Impact Statement for the I-405 Improvement Project in Orange County

Dear Ms. Deshpande:

The San Joaquin Hills Transportation Agency (TCA) appreciates the opportunity to review and provide comments on the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for the I-405 Improvement Project. TCA commends the California Department of Transportation (Caltrans) and the Orange County Transportation Authority (OCTA) staff for the tremendous amount of work and effort in putting these documents together. TCA also recognizes and supports the implementation of these important corridor improvements that enable the Orange County region to address its growing population and its need for additional capacity along its existing transportation corridors.

Please find below TCA's specific comments on the DEIR/EIS.

1. Given the congestion that occurs with traffic connecting to and from State Route 73 (SR 73) with I-405, TCA suggests that Alternative 3 be selected as the preferred alternative for the I-405 improvement project. The inclusion of the direct connection ramps with SR 73 will provide an uncongested entry point of I-405 traffic to and from SR 73. The direct connector is expected to improve safety by reducing the need of HOV or Express Lane motorists to weave across 4 or more GP lanes to access SR 73.
2. Priced facilities are an especially important tool for providing intra-county, inter-county and interregional capacity. Should Alternative 3 be selected as the preferred alternative, TCA requests that further consideration be given that the future lanes on SR 73 between

Thomas E. Margio, Chief Executive Officer

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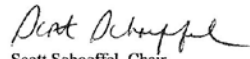
GR6 Continued

Ms. Smita Deshpande  
June 14, 2012  
Page 2

- Jamboree Boulevard and the I-405/SR 73 direct connector, be evaluated for Express Lanes. This would provide a seamless toll-to-toll connection between the 73 Toll Road and I-405. } 2
3. The TCA also commends Caltrans and OCTA for identifying FasTrak as the preferred technology to collect user fees for any potential HOT lane alternative. The FasTrak technology will ensure regional inter-operability between all existing Express Lanes, HOT lanes and toll roads, as well as provide a convenience for drivers using this common technology. } 3
4. While the proposed build alternatives all appear to increase mobility throughout the study area, construction of these alternatives has the potential to negatively impact traffic and therefore, toll revenue on the San Joaquin Hills Transportation Corridor 73 Toll Road. We request that Caltrans and OCTA minimize these impacts by providing closures only during non-peak traffic times and in close coordination with TCA staff. } 4
5. TCA has a changeable message sign within State right of way facing southbound traffic at Harbor Boulevard and I-405. The project should provide for any relocation of this sign and its appurtenances as necessary for the implementation of the project elements. } 5
6. TCA would like to review and provide input to any changes to the existing advanced signage related to the 73 Toll Road within the project area. } 6

Again, we thank you for the opportunity to review the DEIR/EIS and we look forward to the final EIR/EIS for the project. Should you have any questions or require any clarification regarding these comments, please feel free to contact Ms. Valarie McFall, Director, Environmental Services at 949.754.3475 or via email at [vmcfall@thetollroads.com](mailto:vmcfall@thetollroads.com).

Sincerely,



Scott Schoeffel, Chair  
San Joaquin Hills Transportation Corridor Agency

cc: TCA Board of Directors  
Will Kempton, OCTA

## **RESPONSE TO GOVERNMENT (REGIONAL) COMMENTS (GR)**

### **Response to Comment Letter GR1**

#### **Comment GR1-1**

Caltrans and OCTA thank Gateway Cities Council of Governments (COG) for participating in the environmental process for the I-405 Improvement Project. COG's comments were considered during identification of the Preferred Alternative as described in the Final EIR/EIS. COG will be notified at the address provided in your comment when the Final EIR/EIS is available.

Please see Common Response – Coordination between Caltrans Districts 7 and 12, OCTA, Los Angeles Metro, COG, and the City of Long Beach.

The Notice of Preparation (NOP) was circulated through the Office of Planning and Research State Clearinghouse, sent for posting to local libraries in surrounding cities, and posted online on OCTA's and Caltrans' Web sites. The City of Long Beach provided comments on the NOP (see Comment Letter GL11 and Responses to Comments GL11-1 through GL11-38).

#### **Comment GR1-2**

COG has provided, and Caltrans has considered, the studies listed below in terms of how the potential projects identified in the studies relate to the I-405 Improvement Project, described in Response to Comment GR1-13.

- SR-91/I-605 Needs Assessment Study, September 2005
- Orange and Los Angeles Intercounty Transportation Study – Corridor Mobility Problem and Purpose and Need Report, February 6, 2008
- SR-91/I-605/I-405 Initial Corridor Studies, April 2008
- SR-91/I-605/I-405 Congestion Hot Spots – Arterial Intersection Congestion Analysis Report, May 29, 2012
- SR-91/I-605/I-405 Congestion Hot Spots – Model Run Summary Notebook, June 28, 2012
- SR-91/I-605/I-405 Congestion Hot Spots – Gateway Cities Transportation Strategic Plan – Phase I, July 2012
- SR-91/I-605/I-405 Congestion Hot Spots – Freeway Congestion Analysis Report, July 24, 2012

#### **Comment GR1-3**

There has been substantial coordination with COG, the City of Long Beach, Los Angeles Metro, and Caltrans District 7, as summarized in Common Response – Coordination between Caltrans Districts 7 and 12, OCTA, Los Angeles Metro, COG, and City of Long Beach.

A Supplemental Traffic Study has been prepared and a Supplemental Draft EIR/EIS prepared and circulated covering the potential traffic impacts in Los Angeles County. The analysis and measures presented in the Supplemental Draft EIR/EIS are included in Section 3.1.6 of the Final EIR/EIS. It is noted that the report *SR-91/I-605/I-405 Congestion Hot Spots – Model Run Summary Notebook* (June 28, 2012) prepared by the commenting agency provides a comparison of the 2035 forecast traffic volumes for its No Build Alternative and I-405 Alternative 3. On page 42 of that report, the table reporting Daily Freeway Traffic volumes in 2035 shows a zero percent difference between the No Build Alternative and I-405 Alternative 3 on I-405 west of I-605 and a 0.5-percent increase in traffic on I-605 south of SR-91.

It would be inappropriate for the I-405 Improvement Project to utilize traffic studies prepared for other projects because those traffic studies make a variety of assumptions regarding background networks, future projects, forecast years, and other variables that may be inconsistent with the traffic study prepared for the I-405 Improvement Project.

With respect to coordination of transportation planning activities, please see Response to Comment GR1-1.

**Comment GR1-4**

A Supplemental Traffic Study has been prepared and a Supplemental Draft EIR/EIS prepared and circulated covering potential traffic impacts in Los Angeles County. The analysis and measures presented in the Supplemental Draft EIR/EIS are included in Section 3.1.6 of the Final EIR/EIS.

OCTA has an ongoing planning process for the identification of transit improvements needed throughout Orange County, including connections into Los Angeles County, which is the appropriate process to be followed for coordination of transit services at the county line.

**Comment GR1-5**

The referenced statement in the Executive Summary, “The northern terminus of the proposed project is at the interchange of I-405 and I-605.” has been revised to “The northern extent of major construction activities is at the interchange of I-405 and I-605.” As described in the first paragraph of the same Section S.3, Project Description, it is stated that the project extends into Los Angeles County on both I-405 and I-605 “...and in Los Angeles County from the county line (07-LA-405 PM 0.00) to 1.4 miles north of I-605 (07-LA-405 PM 1.2),” “....and in Los Angeles County from the county line (07-LA-605 PM R0.0) to 0.9-mile north of the Spring Street Overcrossing (07-LA-605 PM R1.2).” The document represents work in Los Angeles County and on SR-22 as “....signing and striping to accommodate the transition from the existing to the proposed facility.”

**Comment GR1-6**

The commenter stated that the project should “include multi-modal alternatives to integrate multiple forms of transportation modes, such as pedestrian, bicycle, automobile, and transit.” These are potential components of TSM, as described in Section 2.2.3. The project includes multimodal components. As described on page 3.1.6-103 of the Draft EIR/EIS: “Pedestrian facilities along both sides of the street are proposed for 13 of the 17 arterials crossing I-405 that do not currently have pedestrian facilities on both sides of the arterial at the crossing or on the approaches to the crossing.” On the same page, it is noted that all three build alternatives would provide pavement to accommodate standard Class 2 bikeways for all of the existing Class 2 bikeways and five planned bikeways that do not currently exist. As described in Section 2.2.7, Alternatives Considered but Eliminated from Further Discussion, of the Draft EIR/EIS, TSM and TDM components, including multimodal alternatives, were included and evaluated in various forms in the initial 13 MIS alternatives (see Section 2.2.4). All of the alternatives included park-and-ride facilities, as well as either enhanced local bus service, express bus service, or both. Although a TSM/TDM Alternative as an effective stand-alone alternative does not meet the project purpose, as explained in Section 2.2.7, Alternatives Considered but Eliminated from Further Discussion, the PDT identified the proposed TSM and TDM elements for the corridor. These elements would be implemented as part of Alternatives 1, 2, and 3, as described in Section 2.2.1, Common Design Features of the Build Alternatives, and include the following:

- Improved ramp metering hardware and software and closed-circuit television systems for viewing ramps and nearby arterials;
- At locations of interchange improvements, upgraded traffic signals interconnected and coordinated with adjacent signals and ramp meters;
- Additional way-finding signs on freeways and arterials;
- Design of on- and off-ramps to limit impacts to nonmotorized travel and preserve access to bike lanes and trails such as the Santa Ana River bike trail;
- Intelligent Transportation Systems (ITS) elements, including fiber-optic and other communication systems for improved connectivity and remote management; changeable message signs; closed-circuit television coverage of the entire freeway mainline, ramps, and adjacent arterials; video detection systems; and vehicle detection systems for volume, speed, and vehicle classification;
- Advanced Traffic Management System improvements to the hardware and software systems at the Caltrans District 12 Traffic Management Center; and
- Traveler Information Management System improvements to enhance dissemination of real-time information on roadway conditions.

**Comment GR1-7**

Except as described below, Caltrans concurs with the characterization of the text from the Draft EIR/EIS:

- Second paragraph should have read, “Table S-1 on Page S-14...” In addition, the quoted text should also have read “Implementation of the proposed project is anticipated to result in a beneficial effect on neighborhoods and community cohesion by reducing cut-through traffic within the adjacent neighborhoods.”

Section S.6 has been revised to include the following statement: “Numerous meetings were held with officials of the Gateway Cities Council of Governments, Los Angeles Metropolitan Transportation Agency, Caltrans District 7, and the City of Long Beach to coordinate a variety of topics related to the proposed project.”

Tables 5-1 and 5-2 of the Draft EIR/EIS have been revised in the Final EIR/EIS to include the COG, Los Angeles Metro, and Caltrans District 7, as appropriate.

**Comment GR1-8**

Please see Response to Comment GR1-5.

**Comment GR1-9**

The purpose of the proposed action, as discussed in Section 1.2.1 of the Draft EIR/EIS, is to reduce congestion; enhance operations; increase mobility, improve trip reliability, maximize throughput, and optimize operations; and minimize environmental impacts and ROW acquisition. In furtherance of the project’s purpose, the following objective is established: To be consistent with regional plans and find a cost-effective early project solution for delivery. The latter is not the purpose of the project; it is an objective of the project as described above.

Table 1-2 of the Draft EIR/EIS shows Existing and Projected 2020 and 2040 LOS and v/c ratios for the northbound lanes only. The data are provided for the existing and future no-build conditions only and show continued degradation of LOS and v/c throughout the corridor if nothing is done.

Table 3.1.2-1 in Section 3.1.2.2 was updated in the Final EIR/EIS to include growth projections for Los Angeles and Long Beach, and Long Beach State and Long Beach Airport were included in the discussion of employment centers; however, it should be noted that work in Los Angeles County (i.e., striping and signing) is required for Alternative 3 only and will have no effect on growth-related project effects.

**Comment GR1-10**

The bottlenecks on I-405 referred to in the text on page 1-14 of the Draft EIR/EIS refer to bottlenecks within the proposed project limits. The text has been revised to make this clear. Discussion related to the traffic bottleneck on the southbound I-605 connector to I-405 southbound was added to Section 3.1.6 of the Final EIR/EIS. Alternatives 1 and 2 provide a second receiving lane on I-405 southbound at the merge point of the ramp from I-605 southbound to I-405 southbound. The Alternative 3 design does not provide this second receiving lane.

**Comment GR1-11**

Please see Response to Comment GR1-2 and Common Response – Coordination between Caltrans Districts 7 and 12, OCTA, Los Angeles Metro, COG, and the City of Long Beach.

**Comment GR1-12**

Please see Response to Comment GR1-3.

**Comment GR1-13**

Projects included in the RTP and FTIP were considered in determining that the project would not prevent the implementation of other future improvements. Consideration of additional potential projects currently in the planning stage and noted below has been included in the Final EIR/EIS in Section 1.2.2.7, Independent Utility and Logical Termini.

Projects currently being planned in Los Angeles County to widen I-405 by one or two lanes in each direction and/or to include Express Lanes are still in the early planning stages. The *SR-91/I-605/I-405 Congestion Hot Spots* study prepared by Los Angeles Metro and the COG in 2012 is the most recent planning document that includes and evaluates potential improvements along the I-405 and I-605 corridors north of the I-405/I-605 interchange. Preparation of Project Study Reports covering discrete portions of SR-91, I-605, and I-405 is the next step in advancing projects in this area.

The *SR-91/I-605/I-405 Congestion Hot Spots* study includes three concepts for improvements on I-405 and I-605 north of their interchange. The concepts provide for the addition of one or two lanes in each direction on I-405 in Los Angeles County north of the I-405/I-605 interchange. Because the I-405 Improvement Project in Orange County would terminate improvements (except for signing and striping associated only with the Express Lane transitions in Alternative 3) within Orange County, none of the concepts considered in the *SR-91/I-605/I-405 Congestion Hot Spots* study would be precluded by the I-405 Improvement Project in Orange County. Widening of I-405 in Los Angeles County north of I-605 would effectively continue the I-405

Improvement Project in Orange County as far north as Temple Avenue in Long Beach and would represent a complementary improvement to the improvements proposed south of the I-405/I-605 interchange in Orange County. Adjustments to Express Lane transition areas, which consist of signing and striping, in Los Angeles County may be required if Alternative 3 is identified as the Preferred Alternative and Express Lanes are not included in a future widening of I-405 in Los Angeles County. Express Lanes are a potential alternative for widening in Los Angeles County because this corridor is identified as part of the Express Lane network identified in the 2012 RTP.

The *SR-91/I-605/I-405 Congestion Hot Spots* study includes potential improvements on I-605 and north of the I-405/I-605 interchange. The potential improvements include improvements to the Katella Avenue/Willow Street and Spring Street/Cerritos Avenue interchanges and a northbound auxiliary lane north of Spring Street. Because the I-405 Improvement Project in Orange County would terminate improvements to I-605, except for signing and striping associated only with the Express Lane transitions in Alternative 3, south of Katella Avenue, none of the concepts considered in the *SR-91/I-605/I-405 Congestion Hot Spots* study would be precluded by the I-405 Improvement Project in Orange County.

The *SR-91/I-605/I-405 Congestion Hot Spots* study identifies the I-605/I-405 interchange as an area of improvement; however, no details of the improvements are provided other than provision for a dual-lane branch connector from I-605 southbound to northbound I-405. Page 56 of the COG's *SR-91/I-605/I-405 Initial Corridors Study* (April 2008) and the COG's *SR-91/I-605 Needs Assessment Study* (September 2005) identify the I-605 southbound merge onto southbound I-405 as a congestion problem due to the narrowing of the I-605 approach onto I-405 to a single lane. Please see Response to Comment GR1-10.

Section 1.2.2.7, Independent Utility and Logical Termini, of the Final EIR/EIS identifies planned projects to widen I-405 in Los Angeles County and to improve the I-605/I-405 interchange. The section also indicates that none of these projects would be precluded based on the extent to which the projects are currently defined.

The statement on page 1-24 of the Draft EIR/EIS referenced in the comment is accurate in that the proposed alternatives would not change or restrict other foreseeable improvements or affect the HOV lanes outside of the project limits. Quantitative analysis is not necessary to support this statement. No projects have been identified that the proposed project would restrict, and the proposed project does not change the HOV lanes beyond the project limits.

**Comment GR1-14**

Only Alternative 3 would require work in Los Angeles County. Project layouts for Alternative 3, including those in Los Angeles County, are provided in Appendix P3 (L-31 through L-36) of the Final EIR/EIS. Layouts L-31 through L-36 show the lane configurations and transitions within Los Angeles County.

**Comment GR1-15**

Consistency with regional plans is discussed in Section 3.1.1.2, Environmental Consequences, in the Final EIR/EIS.

**Comment GR1-16**

The description of the TSM/TDM elements of each of the build alternatives is presented on page 2-17 of the Draft EIR/EIS. The Draft EIR/EIS identifies what TSM/TDM elements are proposed for inclusion in the project and the potential impacts of their implementation. The TSM/TDM and transit improvements noted in the *Orange County/Los Angeles County Inter-County Transportation Study* (Inter-County Study) include general transit improvements, such as the need for additional transit service across the Orange/Los Angeles county line, particularly with respect to services not focused on local transit malls (page 111). OCTA has an ongoing planning process for the identification of transit improvements needed throughout Orange County, including connections into Los Angeles County, which is the appropriate process to be followed for coordination of transit services at the county line. The Inter-County Study (page 117) also recommends consideration of ramp metering, traffic monitoring, and congestion pricing. Ramp metering and traffic monitoring are included in the TSM/TDM items included in all of the build alternatives as stated on page 2-17 of the Draft EIR/EIS. Congestion pricing is included in the Express lanes of Alternative 3. Please see also Response to Comment GR1-6.

**Comment GR1-17**

A Supplemental Traffic Study has been prepared and a Supplemental Draft EIR/EIS prepared and circulated covering potential traffic impacts in Los Angeles County. The analysis and measures presented in the Supplemental Draft EIR/EIS are included in Section 3.1.6 of the Final EIR/EIS.

**Comment GR1-18**

A Supplemental Traffic Study has been prepared and a Supplemental Draft EIR/EIS prepared and circulated covering potential traffic impacts in Los Angeles County. The Supplemental Traffic Study and the Supplemental Draft EIR/EIS provide information regarding future traffic operations along freeways in Los Angeles County under each of the alternatives. The analysis presented in the Supplemental Draft EIR/EIS is included in Section 3.1.6 of the Final EIR/EIS.

The GP lanes are improved in Alternative 3 as a result of its Express Lanes. As shown in Tables 3.1.6-5 and 3.1.6-13, LOS in the GP lanes is F but, as also shown in the tables, v/c ratios are lower in the GP lanes under Alternative 3 than under the No Build Alternative. Under LOS F conditions, traffic flow is below capacity and anticipated to be less than traffic flow per lane in the Express Lanes under LOS D conditions shown in those same tables. Because flow is higher in the Express Lanes, traffic would be attracted from the GP lanes to the Express Lanes, reducing the volume in the GP lanes and enhancing GP lane operations.

Slow-moving congested freeway lanes have lower and unstable throughput compared to uncongested lanes. During peak periods, the GP lanes on I-405 are forecast to be heavily congested with lower throughput (approximately 1,200 vehicles per hour per lane [vphpl]) than the Express Lanes, whose throughput would be managed to approximately 1,700 vphpl. For an explanation of how this management works, see page 2-20 of the Draft EIR/EIS. By providing more throughput per lane through management of the Express Lanes, traffic in the GP lanes would be reduced and congestion eased; for two conditions with the same total number of lanes and congested conditions, congestion in the GP lanes would be less if two of the lanes were managed to increase their throughput. See the rows of Table 3.1.6-14 labeled “Brookhurst Street to SR-22 East” for a comparison of the throughput of Build Alternatives 2 and 3 with the same total number of lanes.

The Traffic Study (Draft EIR/EIS Appendix L) provides analysis of traffic operations at the northern end of the project as shown in Tables 2.3.1, 2.4.1, 2.4.2, 2.5.1, 2.5.2, 2.6.1, 2.6.2, 2.7.1, and 2.7.2. The Draft EIR/EIS summarizes the operations on the branch connectors at the SR-22/7<sup>th</sup> Street and I-605 interchanges in Tables 3.1.6-9 and 3.1.6-15. The transition areas at the ends of the Express Lanes along I-405 and I-605 near the northern terminus of the proposed project are presented in Table 3.1.6-17 of the Draft EIR/EIS. Interchanges and operations along I-405 and I-605 north of the project limits are included in the Supplemental Traffic Study and the Supplemental Draft EIR/EIS. See also Common Response – Traffic Flow at the Orange County/Los Angeles County Line.

**Comment GR1-19**

With respect to queuing at the northern end of the project, please see Response to Comment GR1-3 and Common Response – Traffic Flow at the Orange County/Los Angeles County Line.

Weaving analysis is presented in the Traffic Study (Draft EIR/EIS Appendix L) in Tables 2.3.3, 2.4.6 through 2.4.8, 2.5.6 through 2.5.8, 2.6.6 through 2.6.8, and 2.7.6 through 2.7.8. The transition areas at the termini of the Express Lanes in Alternative 3 are not weaving areas, but their analysis is presented in Table 3.1.6-17 of the Draft EIR/EIS.

The proposed project is not a safety project.

**Comment GR1-20**

The coordination with Los Angeles County referenced in the comment has been accomplished with the adoption of the RTP. If Alternative 3 becomes the Preferred Alternative, Caltrans and OCTA would be implementing an element of regional coordination embodied in the RTP. Currently, there are no projects programmed for I-405 within or immediately north of the project area of the I-405 Improvement Project in Orange County. Please see also Common Response – Coordination between Caltrans Districts 7 and 12, OCTA, Los Angeles Metro, COG, and the City of Long Beach.

**Comment GR1-21**

Table 3.1.6-17 of the Draft EIR/EIS shows the Alternative 3 Express Lane transition area, and it is labeled “I-405 – I-605 to San Gabriel.” Page 3.1.6-102 discusses the findings of the I-405 Traffic Study. Gateway Cities COG has not conducted a study that evaluates the branch connectors at the I-405/I-605 interchange assuming Express Lanes on I-405 and on the direct connector between I-605 and I-405.

**Comment GR1-22**

The Supplemental Traffic Study and the Supplemental Draft EIR/EIS include analysis for both ends i.e. north (I-605) and south (I-405) termini of the project supporting project’s long-term benefits for transportation network as well as intersection circulation improvement, and congestion reduction. This analysis is included in Section 3.1.6 of the Final EIR/EIS. For further details, please see Response to Comment GR1-18 and Common Response – Traffic Flow at the Orange County/ Los Angeles County Line.

**Comment GR1-23**

All projects included in the RTP and local projects that have received environmental clearance were included in the traffic forecasting process. Projects included in cumulative analysis are limited to those reasonably foreseeable projects listed in Table 3.6-1 of the Draft EIR/EIS.

Table 3.6-1 was updated to include additional projects within Los Angeles County, as determined applicable by the PDT.

**Comment GR1-24**

As described in Section 3.6.5.5, Community Impacts, of the Draft EIR/EIS, the resource study area (RSA) for the community impact assessment includes the localized area within the project limits and surrounding vicinity within a 0.5-mile radius of the I-405 corridor. This would include those portions of Long Beach and Los Angeles County shown in Figure 3.1.4-1. Additional

discussion of pertinent community data for Long Beach and Los Angeles County has been incorporated throughout the Final EIR/EIS for the build alternatives, as applicable.

**Comment GR1-25**

Please see Responses to Comments GR1-1 through 3, 10, 11, 13, and 17 through 22, and Common Response – Coordination between Caltrans Districts 7 and 12, OCTA, Los Angeles Metro, COG, and the City of Long Beach.

**Comment GR1-26**

Please see Responses to Comments GR1-1 and GR1-3.

**Comment GR1-27**

Please see Response to Comment GR1-25.

**Comment GR1-28**

Please see Responses to Comments GR1-3 and GR1-25 and Common Response – Coordination between Caltrans Districts 7 and 12, OCTA, Los Angeles Metro, COG, and the City of Long Beach.

**Comment GR1-29**

Please see Responses to Comments GR1-6 and GR1-16.

**Comment GR1-30**

Please see Responses to Comments GR1-1 and GR1-3.

**Comment GR1-31**

Please see Response to Comment GR1-13.

**Response to Comment Letter GR2**

**Comment GR2-1**

Caltrans and OCTA thank the Orange County Fire Authority (OCFA) for participating in the environmental process for the I-405 Improvement Project. OCFA's comment was considered during identification of the Preferred Alternative as described in the Final EIR/EIS. OCFA will be notified at the address provided in your comment when the Final EIR/EIS is available for review.

Only Alternatives 2 and 3 would require relocation of the Almond Avenue soundwall. Caltrans/OCTA have considered design options to avoid relocation of the soundwall under Alternatives 2 and 3. Please see Common Response – Almond Avenue Soundwall.

**Response to Comment Letter GR3****Comment GR3-1**

Caltrans and OCTA thank the Orange County Sanitation District (OCSD) for participating in the environmental process for the I-405 Improvement Project. OCSD's comments were considered during identification of the Preferred Alternative as described in the Final EIR/EIS. OCSD will be notified at the address provided in your comment when the Final EIR/EIS is available for review.

The proposed project improvements for the three build alternatives are shown in Draft EIR/EIS Appendix P, Project Plans (P1, P2, and P3), on sheet L-2 of the Draft EIR/EIS. It is not anticipated that the improvements will impact access or operations of the sewer facilities within the OCSD vicinity. Refer to Draft EIR/EIS Appendix K (K1), Utility Plan Sheets U-2, U-40, U-48, and U-49, for proposals to the existing sewer facilities.

**Comment GR3-2**

The proposed project improvements for the three build alternatives consist of constructing a new southbound connector ramp along the south side of Ellis Avenue, with partial acquisition of OCSD ROW that currently is landscaped. The improvements are shown in Draft EIR/EIS Appendix P, Project Plans (P1, P2, and P3), on sheet L-2. As determined in the Euclid Street On-Ramp Bridge and Connector Advanced Planning Study, access to the OCSD property via the main driveway will be maintained during construction of the new ramp connector. Construction of this new ramp connector is proposed to be completed early and be fully operational to alleviate existing congestion at the southbound I-405 ramps/Ellis Avenue/Euclid Street intersection.

**Comment GR3-3**

As described in Measure COM-2, access will be maintained at all times during construction, consistent with Section 7-1.03 Public Convenience of 2010 Standard Specifications. The existing access to the hydrogen fuel cell station via the main driveway across from the southbound ramps at Ellis Avenue/Euclid Street will be maintained by the project. Furthermore, operations of the fuel cell station are not anticipated to be impacted by the project improvements.

**Comment GR3-4**

The proposed project improvements for the three build alternatives are shown in the Draft EIR/EIS Appendix P, Project Plans (P1, P2, and P3), on sheet L-2. It is not anticipated that the improvements will impact access or operations of the sewer facilities within the OCSD vicinity. Refer to the Draft EIR/EIS Appendix K (K1), Utility Plan Sheets U-2, U-40, U-48, and U-49, for proposals to the existing sewer facilities.

**Comment GR3-5**

The requirement has been added to Table 2-2, Probable Permit Requirements and Approvals, of the Final EIR/EIS. At this time, discharge to the sewer is not anticipated. If it is determined that discharge to the sewer is necessary, a Special Purpose Discharge Permit will be obtained.

**Comment GR3-6**

The requirement has been added to Table 2-2, Probable Permit Requirements and Approvals, of the Final EIR/EIS. At this time, discharge to the sewer is not anticipated. If it is determined that discharge to the sewer is necessary, review/approval of water quality of discharges to the sewer and associated measures to eliminate materials and regulated compounds will be coordinated with OCSD staff.

**Response to Comment Letter GR4**

**Comment GR4-1**

Caltrans and OCTA thank the South Coast Air Quality Management District (SCAQMD) for participating in the environmental process for the I-405 Improvement Project. SCAQMD's comments were considered during identification of the Preferred Alternative as described in the Final EIR/EIS. SCAQMD will be notified when the Final EIR/EIS is available for review.

The air quality analysis for the project has been prepared in accordance with the requirements. Please see Common Response – Air Quality. Specific concerns are addressed in the following responses.

**Comment GR4-2**

Section 1.2.2.6, Air Quality Improvements has been modified to remove reference that the project is a TCM in the AQMP. However, Section 1.2.2.7 has been updated stating that the project is identified as a new TCM in Table III-2.3 of the 2015 FTIP.. Please see Response to Comment GR4-1 above.

**Comment GR4-3**

Caltrans and OCTA thank SCAQMD for participating in the environmental process for the I-405 Improvement Project. Comments submitted by SCAQMD have been responded to in the Final EIR/EIS. SCAQMD will be notified when the Final EIR/EIS is available for review.

**Comment GR4-4**

Please see response to Comment GR4-2 above.

**Comment GR4-5**

The air quality analysis was conducted consistent with Caltrans protocols and guidance and addresses both construction and operational impacts. As noted in its Standard Environmental Reference (SER), Caltrans has adopted FHWA guidance for evaluating MSAT emissions. Please see Response to Comment GR4-1 and Common Response – Health Risks.

**Comment GR4-6**

The comment states that the MSAT analysis ignores Section 15064 of the CEQA Guidelines, which requires *substantial evidence* to determine the significance of an impact. FHWA's *Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA Documents* provides substantial evidence documenting the basis for not conducting a quantitative analysis of impacts from toxics. SCAQMD may disagree with this conclusion, but Section 15151 of the CEQA Guidelines clearly states that disagreement among experts does not make an EIR inadequate. Please see Common Response – Health Risks.

**Comment GR4-7**

Caltrans agreed to use the HRA for the Schuyler Heim Bridge Project and conduct an HRA for the I-710 expansion project because of the high volume of diesel truck traffic at these two locations (more than 30 percent trucks near the San Pedro Bay Ports) and because of the documented high levels of public health risk associated with the port activity. These conditions do not apply to the build alternatives, where the truck volumes are approximately 3 to 3.5 percent of the total volume and are less than the regional average of 6.9 percent. In addition, a detailed HRA was not completed and is not necessary because the build alternatives would reduce MSAT emissions in the study area. Please see Common Response – Health Risks.

**Comment GR4-8**

As a Statewide agency covering diverse geographic areas, Caltrans has, as a matter of policy, left the determination of significance to the District Project Development Team (PDT). In the Draft EIR/EIS, the PDT made determinations of significance based on the results of the technical studies and did not use the SCAQMD thresholds. It is not necessary to quantify emission reductions associated with construction-related mitigation measures because these emissions are not compared to the SCAQMD thresholds. Please see Common Response – Traffic Flow at the Orange County/Los Angeles County Line.

**Comment GR4-9**

Any air quality analysis of when, where, or how long construction-related congestion will last that is disclosed on page 3.2.6-27 of the Draft EIR/EIS is subjective and does not require

analysis. In addition, the construction analysis in the Final EIR/EIS has been updated using the current Roadway Construction Emissions Model (Version 7.1.2, September 2012).

**Comment GR4-10**

The conclusion reached in Chapter 4, CEQA Evaluation, is consistent with Caltrans' approach to greenhouse gas (GHG) analysis and disclosure. Caltrans is committed to implementing the measures discussed in Chapter 4 statewide to help reduce the project's effects on global climate change.

**Comment GR4-11**

The Draft EIR/EIS quantified existing criteria pollutant, MSAT, and GHG emissions. As discussed in Comment GF4-1, the build alternatives are not growth inducing. As a result, impacts were evaluated based on the change between the no-build and build conditions. In addition, a CEQA analysis is provided in Chapter 4 of the Draft EIR/EIS.

**Comment GR4-12**

With respect to growth inducement, please see Response to Comment GF4-1. With respect to traffic volumes, the Final EIR/EIS explains that the single demand forecast applies to the peak-hour volumes used for traffic performance analysis. The increase in VMT for the build alternatives shown in Table 3.1.6-3 of the Draft EIR/EIS is a result of a combination of factors, including redevelopment and infill development within the corridor, new development outside the corridor, increasing VMT per person, and reduction in diversion away from the freeway due to increased capacity of the alternatives compared to the no-build condition. Additional traffic is expected to shift from the arterial system onto the freeway during other off-peak hours of the day due to the reduced congestion resulting from the combination of the lower demand during off-peak hours and the added capacity provided under the build alternatives.

**Comment GR4-13**

Please see Response to Comment GF4-1 with respect to induced traffic. As of October 16, 2012, the project description in the 2011 RTP/FTIP (FTIP Amendment #34) was updated to match Alternative 3. If Alternative 1 or 2 is identified as the Preferred Alternative, an additional amendment to the RTP/FTIP may be required. Text in the Final EIR/EIS related to the project listing/description in the RTP/FTIP in the Summary, Chapter 1, Chapter 2, Chapter 3, and Appendix J has been updated to reflect the current status of the project in the RTP/FTIP.

**Comment GR4-14**

The MSAT analysis discussion beginning on page 3.2.6-42 of the Draft EIR/EIS includes VMT data consistent with the Traffic Study. No changes in the conclusions or findings in Section 3.2.6, Air Quality, of the Final EIR/EIS are required.

**Comment GR4-15**

The Draft EIR/EIS discloses the potential for impacts from MSATs to the extent that current scientific information allows. Sensitive receptors are identified, and a qualitative assessment of impacts to the sensitive receptors, including low-income and minority communities, was performed. Quantitative analysis for MSATs was conducted for the project, as described starting on page 3.2.6-42 in Section 3.2.6.3, Environmental Consequences, of the Draft EIR/EIS. Please see Common Response – Health Risks.

**Comment GR4-16**

Please see Common Response – Traffic Flow at the Orange County/Los Angeles County Line. The congested conditions at the north end of the project have been included in the air quality analysis. The air quality analysis presented in the Draft EIR/EIS was based on traffic conditions forecast in the Traffic Study, which shows congested conditions in the area at the north end of the project. Tables 3.1.6-4, 3.1.6-5, 3.1.6-12, and 3.1.6-13 of the Draft EIR/EIS show that the segment of I-405 from SR-22 East to I-605 is anticipated to be congested to varying degrees under all of the build alternatives.

**Comment GR4-17**

TSM/TDM are included in each of the build alternatives and are identified on page 2-17 of the Draft EIR/EIS. The Draft EIR/EIS concludes on page 3.2.6-54 with respect to permanent air quality impacts that “No adverse operational impacts were identified, and no operational avoidance, minimization, and/or mitigation measures are required.” It is agreed that additional TDM and/or transit options in the project corridor may improve air quality, but they are not required for this project because air quality improves under any of the build alternatives compared to the No Build Alternative. OCTA provides a planning process to identify such potential TDM and transit improvements on a countywide basis and is anticipated to provide consideration for them as part of that process. Transit vehicles will be eligible to use the HOV and/or Express Lanes included in the build alternatives.

**Comment GR4-18**

As of October 16, 2012, the project description in the 2011 RTP/FTIP (FTIP Amendment #34) was updated to match Alternative 3. If Alternative 1 or 2 is identified as the Preferred

Alternative, an additional amendment to the RTP/FTIP may be required. The conformity determination is based on the Preferred Alternative.

**Comment GR4-19**

The Final EIR/EIS will be reviewed to ensure that traffic data used to estimate emissions associated with Alternative 1 are consistent with the traffic analysis. Please see Response to Comment GR4-14.

**Comment GR4-20**

The Air Quality Technical Study was completed in May 2011. EMFAC 2011 was not used at that time in accordance with Caltrans policy, which only requires use of EMFAC 2011 for new environmental studies started after October 1, 2011. However, supplemental analysis using EMFAC 2011 was completed in January 2014 and there were no substantial difference in the results. Section 3.2.6, Air Quality, of the Final EIR/EIS has been updated as applicable.

**Response to Comment Letter GR5**

**Comment GR5-1**

Caltrans and OCTA thank the Southern California Association of Governments (SCAG) for participating in the environmental process for the I-405 Improvement Project. SCAG's comment was considered during identification of the Preferred Alternative as described in the Final EIR/EIS. SCAG will be notified at the address provided in your comment when the Final EIR/EIS is available for review.

Please see Common Response – Coordination between Caltrans Districts 7 and 12, OCTA, Los Angeles Metro, COG, and the City of Long Beach.

**Response to Comment Letter GR6**

**Comment GR6-1**

Caltrans and OCTA thank the Transportation Corridor Agencies (TCA) for participating in the environmental process for the I-405 Improvement Project. TCA's comments were considered during identification of the Preferred Alternative as described in the Final EIR/EIS. TCA will be notified at the address provided in your comment when the Final EIR/EIS is available for review. Please see Common Response – Preferred Alternative Identification.

**Comment GR6-2**

HOV lanes are shown in the current RTP on SR-73. At the time that Caltrans pursues a project to implement these HOV lanes, consideration may be given to implementation of those lanes as HOT or Express Lanes.

**Comment GR6-3**

Caltrans appreciates this comment.

**Comment GR6-4**

The project will have close coordination with OCTA, cities, and other project stakeholders, including TCA, during final design, with appropriate lane closure charts to be included with the Contract Special Provisions.

**Comment GR6-5**

The existing TCA “The Toll Roads” changeable message sign would not be impacted under Alternative 3, as shown in the revised Appendix P Project Plans L-6A of the Final EIR/EIS. Please see Common Response – Replacement of Fairview Road Overcrossing/Truncation of Tolled Express Lanes.

**Comment GR6-6**

The project will have close coordination with stakeholders, including TCA, with respect to the existing advance guide signs to SR-73 during the design phase of the project should Alternative 3 be identified as the Preferred Alternative.